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Attorneys for Michael Lacey

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

In the Matter of the Seizure of:

Any and all funds held in Republic Bank of Arizona Account(s) xxxx1889, xxxx2592, xxxx1938, xxxx2912, and, xxxx2500.

Case No. 2:18-cv-06742-RGK-PJW

CLAIMANT MICHAEL LACEY'S JOINDER IN JAMES LARKIN'S LEGAL AUTHORITY FOR OPPOSITION TO SEIZURE WARRANTS AND BASIS FOR RELIEF

Assigned to Hon. R. Gary Klausner
Courtroom 850

TO THE COURT AND ALL COUNSEL OF RECORD:

PLEASE TAKE NOTICE THAT Claimant Michael Lacey, by and through his counsel, will and hereby does join in James Larkin's Legal Authority for Opposition to Seizure Warrants and Basis for Relief [Doc. 106], and adopts all of the positions set forth in the Opposition as if fully set forth herein.

Mr. Lacey joins in the Opposition because he is “so similarly situation [to Mr. Larkin] that filing an independent [opposition] would be redundant.” *Tatung Co., Ltd. v. Shu Tze Hsu*, 217 F. Supp. 3d 1138, 1151 (C.D. Cal. 2016). Like Mr. Larkin, Mr. Lacey holds an interest in assets that were seized pursuant to civil seizure warrants issued by the magistrate judges in this District, and which are the subject of Mr. Larkin’s Motion to Vacate or Modify Seizure Warrants (the ‘Seizure Motion’) [Doc. 6]. The Opposition raises issues that are directly relevant to and overlap with the seizures of Mr. Lacey’s assets. All of the arguments made in the Opposition therefore apply with equal force to the seizure warrants issued against the assets in which Mr. Lacey holds an interest.

DATED: November 14, 2019 Respectfully submitted,

Paul J. Cambria, Jr.
Lipsitz Green Scime Cambria LLP

By: /s/ Paul J. Cambria, Jr.

Paul J. Cambria, Jr.
Attorneys for Michael Lacey

CERTIFICATE OF SERVICE

I hereby certify that on November 14, 2019, I filed the foregoing with the United States District Court for the Central District of California using the CM/ECF system.

I hereby certify that on November 14, 2019, a copy of the foregoing was also delivered to the following via CM/ECF:

JOHN K. KUCERA, ESQ.
Assistant U.S. Attorney
U.S. Attorney's Office
Asset Forfeiture Section
312 North Spring Street
Los Angeles, CA 90012

Dated: Buffalo, New York
November 14, 2019

/s/Kristina Brewery
Kristina Brewery